

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

LEINANI DESLANDES, on behalf of herself)
and all others similarly situated,)
Plaintiff,) Case No. 17-cv-04857
v.) Judge Jorge L. Alonso
McDONALD'S USA, LLC, a Delaware limited)
liability company, McDONALD'S)
CORPORATION, a Delaware corporation; and)
DOES 1 through 10, inclusive,)
Defendants.)

STEPHANIE TURNER, on behalf of herself)
and all others similarly situated,)
Plaintiff,) Case No. 19-cv-05524
v.)
McDONALD'S USA, LLC, a Delaware limited)
liability company, McDONALD'S)
CORPORATION, a Delaware corporation,)
Defendants.)

**JOINT MOTION FOR EXTENSION OF THE SCHEDULE FOR SETTLEMENT
MEDIATION, EXPERT DISCOVERY, AND ANCILLARITY DEFENSE AND CLASS
CERTIFICATION BRIEFING**

Leinani Deslandes and Stephanie Turner (“Plaintiffs”), and McDonald’s USA, LLC and McDonald’s Corporation (“Defendants”), by their respective undersigned counsel, hereby jointly move this Court for entry of their agreed settlement mediation, expert discovery, and ancillarity defense briefing schedule, and in support of this motion state as follows:

1. The parties previously scheduled a settlement conference to be held on June 10, 2025. In accordance with Judge Weisman's Standing Order for Settlement Conferences, Plaintiffs

and Defendants exchanged pre-settlement conference letters on May 27, 2025, and June 3, 2025, respectively.

2. The scheduled in-person settlement conference was postponed by the Court on June 10, 2025. The parties agreed to reschedule the settlement conference for August 26, 2025, at 10:30 am.

3. Under the current case schedule, expert discovery closes on June 20, 2025. Dkt. 519.

4. Under the current case schedule, the deadline for Defendants to file their motion regarding the ancillary restraint defense is July 18, 2025. The deadline for Plaintiffs to respond to the motion regarding the ancillary restraint defense and file a cross-motion regarding the ancillary restraint defense (if any) is September 12, 2025. The deadline for Defendants to file their reply in support of their motion regarding the ancillary restraint defense is November 6, 2025. Dkt. 519; Dkt. 536.

5. Under the current schedule, the deadline for Plaintiffs to file a renewed motion for class certification is September 12, 2025. The deadline for Defendants to respond to the renewed motion is November 6, 2025. The deadline for Plaintiffs to file a reply in support of the renewed motion for class certification is December 8, 2025. Dkt. 536.

6. The parties previously agreed on a mediation date that they believed best enhanced the possibility of a negotiated resolution. The proposed new schedule reflects those same considerations in light of the need to reschedule the mediation date.

7. The parties have agreed to the following schedule to account for the postponement of the settlement conference:

Event	Deadline
Settlement conference	August 26, 2025, at 10:30 am
Close of expert discovery ¹	October 10, 2025
Deadline for Defendants to file their motion regarding the ancillarity restraint defense	November 7, 2025
Deadline for Plaintiffs to file consolidated response regarding ancillary restraint defense and a cross-motion regarding ancillary restraint defense (if any)	January 13, 2026
Deadline for Plaintiffs to file a renewed motion for class certification	January 13, 2026
Deadline for Defendants to file consolidated reply in support of their motion regarding ancillary restraint defense and response to cross motion regarding ancillary restraint defense (if any)	March 10, 2026
Deadline for Defendants to respond to any renewed motion for class certification	March 10, 2026
Deadline for parties to file any motion(s) to exclude expert opinions and testimony	March 10, 2026
Deadline for Plaintiffs to file a reply in support of renewed motion for class certification	April 9, 2026
Deadline for Plaintiffs to file a reply in support of cross-motion regarding ancillary restraint defense (if any)	April 9, 2026
Deadline for parties to file oppositions to any motion(s) to exclude expert opinions and testimony	April 9, 2026
Deadline for parties to file replies in support of any motion(s) to exclude expert opinions and testimony	April 30, 2026

¹ Plaintiffs propose adding a deadline to the schedule for reply expert reports regarding issues for which each party bears the burden of proof. McDonald's opposes this change to the structure of the schedule previously ordered by the Court. Plaintiffs will promptly file a motion to address this issue; McDonald's believes such briefing is unnecessary.

The parties also agree that the following page limitations shall apply: twenty-five (25) pages for the parties' opening and opposition briefs regarding class certification, and fifteen (15) pages for the reply on same; fifteen (15) pages for all briefs regarding motions to exclude expert opinions and testimony; twenty (20) pages for McDonald's opening brief regarding the ancillarity defense, forty (40) pages for Plaintiffs' consolidated response and cross-motion regarding the ancillarity defense, forty (40) pages for McDonald's consolidated reply and response to cross-motion, and twenty (20) pages for Plaintiffs' reply in support of their cross-motion.

Wherefore, the parties jointly move the Court for the entry of the proposed schedule.

Dated: June 20, 2025

Respectfully submitted,

**LEINANI DESLANDES and
STEPHANIE TURNER**

By: /s/ Dean M. Harvey
Dean M. Harvey

**McDONALD'S USA, LLC and
McDONALD'S CORPORATION**

By: /s/ Rachel S. Brass
Rachel S. Brass

Dean M. Harvey*
Anne B. Shaver*
Lin Y. Chan*
**LIEFF CABRASER HEIMANN &
BERNSTEIN, LLP**
275 Battery Street, 29th Floor
San Francisco, California 94111-3339
Tel: (415) 956-1000
dharvey@lchb.com

ashaver@lchb.com
lchan@lchb.com

Jessica A. Moldovan*
Danna Elmasry*
**LIEFF CABRASER HEIMANN &
BERNSTEIN, LLP**
250 Hudson Street, 8th Floor
New York, NY 10013
Tel: 212-355-9500
jmoldovan@lchb.com
delmasry@lchb.com

Derek Y. Brandt (#6228895)
CLARKSON LAW FIRM, P.C.
22525 Pacific Coast Highway
Malibu, California 90265
Tel: 213-788-4050
dbrandt@clarksonlawfirm.com

Richard D. McCune*
Michele M. Vercoski*
Connor P. Lemire*
McCune Law Group
3281 East Guasti Road, Suite 100
Ontario, California 91761
Tel: (909) 557-1250
rdm@mccunewright.com
mmv@mccunewright.com
cpl@mccunewright.com

* Admitted *pro hac vice*

*Attorneys for Individual and Representative
Plaintiffs Leinani Deslandes and Stephanie
Turner*

GIBSON DUNN & CRUTCHER LLP

Rachel S. Brass (admitted *pro hac vice*)
Caeli A. Higney (admitted *pro hac vice*)
Julian W. Kleinbrodt (admitted *pro hac vice*)
One Embarcadero Center, Suite 2600
San Francisco, California 94111-3715
Telephone: (415) 393-8200
Facsimile: (415) 374-8458

Email: RBrass@gibsondunn.com
CHigney@gibsondunn.com
JKleinbrodt@gibsondunn.com

Aronberg Goldgehn Davis & Garmisa

Robert M. Andalman (Atty. No. 6209454)
Rachael Blackburn (Atty. No. 6277142)
225 W. Washington St., 28th Floor
Chicago, Illinois 60606
Tel.: (312) 751-3361

*Attorneys for Defendants McDonald's USA
LLC and McDonald's Corporation*

CERTIFICATE OF SERVICE

I, Rachel S. Brass, an attorney, hereby certify that the foregoing **JOINT MOTION FOR EXTENSION OF THE SCHEDULE FOR SETTLEMENT MEDIATION, EXPERT DISCOVERY, AND ANCILLARITY DEFENSE BRIEFING** was emailed to the registered parties of record on June 20, 2025.

/s/ Rachel S. Brass _____

Rachel S. Brass